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May 10, 2024

Via ECF

Honorable Jessica G.L. Clarke  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: Doe v Combs, et. al. (Pierre)  
Docket Number: 1:23-CV-10628 (JGLC)

Dear Judge Clarke:

We submit this letter, as counsel for Harve Pierre, to respectfully join in the arguments raised in the Motion to Dismiss (DE 55), Declaration of Jonathan Davis (with Supporting Documents) (DE 56) and Supplemental Memorandum of Law (DE 57) filed by counsel for Defendant, Sean Combs (and the related corporate defendants).

For the reasons set forth in those documents, the claims revival provision of N.Y.C. Admin. Code § 10-1105 is invalid. Plaintiff's claim against Mr. Pierre must be dismissed as untimely.

Thank you.

Respectfully submitted,

*Scott Leemon*  
Scott Leemon

*Jonathan Savella*  
Jonathan Savella  
*Counsel for Defendant, Harve Pierre*

cc: All counsel (via ECF)